

CITY AND COUNTY OF SAN FRANCISCO



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July 25, 2016

Hon. Edward M. Chen
United States District Judge
450 Golden Gate Avenue
Courtroom 5-17th Floor
San Francisco, CA 94102

Re: *United States vs. Matthew Mumphrey, et al.*, No. 14-cr-00643-EMC-1
Operation Safe Schools; Status Conference: July 27, 2016

Dear Judge Chen,

I have been assigned to represent the San Francisco Police Department and its officers in connection with your Order of June 30, 2016 (Dkt. #190) in the above referenced case. Regrettably, because I was first notified about this case only last week, I don't know much about it or the history leading up to your Order. Based on my initial review of the Order, there appears to be some question as to why the Department's interests were not represented in response to defendants motion to compel and I am concerned that a substantive response was not provided to the Court. Nevertheless, I understand there is a Status Conference set for July 27, 2016, regarding the meet and confer process referenced in your Order.

Unfortunately, because I am in the middle of moving homes and about to start a long planned and overdue family vacation, I cannot attend the conference. Further, it appears there is a significant amount of information and history to review in order to familiarize myself with the issues in this case and engage in any meaningful discussions with the parties about a response to the Order. Given my schedule and the amount of work that needs to be done, I cannot be prepared to advise the Court as to the status of the Department's position by July 27, 2016. However, I will send a representative from our office to attend in order to help facilitate scheduling. While we are certainly prepared to cooperate with the parties and follow the Order, we simply need more time to review the record and prepare a response.

I attempted to contact Ms. Amran, who I am told is lead counsel for the defense, but was informed that she is out of the office. I left her a phone message and emailed her this past week, but have not heard back from her. I have also spoken to representatives from the United States Attorney's Office. With the Court's understanding, I request that another status conference be set in late August or September.

I apologize for any inconvenience to the Court and the parties.

Very truly yours,
DENNIS J. HERRERA
City Attorney


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